COPS
**COMMUNITY ORIENTED POLICING SERVICES**
**U.S. DEPARTMENT OF JUSTICE**

# Grant Monitoring Standards and Guidelines for Hiring and Redeployment

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# Grant Monitoring Standards and Guidelines for Hiring and Redeployment

## I. Purpose of the Monitoring Standards Guides

# I. Purpose of the Monitoring Standards Guides

The purpose of the Monitoring Standards and Guidelines is to provide assistance with the administration, monitoring, and auditing of the Office of Community Oriented Policing Services (COPS) grant performance and compliance requirements. These activities help determine whether COPS grantees are complying with their Hiring which includes; Police Hiring Supplement (PHS), Phase I, Accelerated Hiring, Education and Deployment (AHEAD), Funding Accelerated for Smaller Towns (FAST), Universal Hiring Programs (UHP) and COPS in Schools (CIS) as well as Making Officer Redeployment Effective (MORE) grant terms and conditions. The eight compliance categories representing the terms and conditions for Hiring and MORE grants are: community policing; retention; allowable costs; source and amount of matching funds; supplanting; training special condition for CIS grantees, reporting and timesavings for redeployment.

This Monitoring Standards Guide provides two major functions for the Hiring and MORE grant programs. First, it provides a definition of each of the eight primary compliance categories, as well as the related specific terms and conditions required to comply with the COPS Hiring which also includes; Police Hiring Supplement (PHS), Phase I, Accelerated Hiring, Education and Deployment (AHEAD), Funding Accelerated for Smaller Towns (FAST), Universal Hiring Programs (UHP) and COPS in Schools (CIS) and Making Officer Redeployment Effective (MORE) grant programs. Second, it provides a list of performance standards and indicators for each category, which can be used to help determine whether grantees are meeting the COPS grant program requirements. Also included in the beginning of this guide is a summary of the covered COPS grant programs and an explanation of the COPS Office's monitoring and auditing activities that grantees may expect upon grant award.

Grantees seeking additional information regarding any of these requirements may contact their Grant Program Specialist through the COPS Office Response Center at 800.421.6770 or through e-mail at askCOPSRC@usdoj.gov.

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## II. Purpose of the COPS Grant Programs

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The Office of Community Oriented Policing Services (COPS) was created as a result of the Violent Crime Control and Law Enforcement Act of 1994. As a component of the U.S. Department of Justice, the COPS Office has the unique mission to directly serve the needs of state and local law enforcement in their efforts to address local crime and disorder through the use of proven community policing strategies. The COPS Office has been the driving force in advancing community policing, and is responsible for one of the greatest infusions of resources into state and local law enforcement in our nation's history.

Since 1994, COPS has invested over 10 billion of dollars to add community policing officers to the nation's streets, enhance crime fighting technology, support crime prevention initiatives, and provide training and technical assistance to help advance community policing. COPS funding has furthered the advancement of community policing through community policing innovation conferences, the development of best practices, pilot community policing programs, and applied research and evaluation initiatives. COPS has also positioned itself to respond directly to emerging law enforcement needs. Examples include working in partnership with departments to enhance police integrity, promoting safe schools, and combating the methamphetamine drug problem.

The COPS Office has made substantial investments in law enforcement training. COPS created a national network of Regional Community Policing Institutes that are available to state and local law enforcement, elected officials and community leaders for training opportunities on a wide range of community policing topics. COPS also supports the advancement of community policing strategies through the Community Policing Consortium. Additionally, COPS has made a major investment in applied research which makes possible the growing body of substantive knowledge covering all aspects of community policing.

These substantial investments have produced a significant national community policing infrastructure, as evidenced by the fact that at the present time, approximately 86% of the nation's population is served by law enforcement agencies practicing community policing. The COPS Office continues to respond proactively by providing critical resources, training, and technical assistance to help state and local law enforcement implement innovative and effective community policing strategies.

At the end of fiscal year 2003, the COPS Office had funded 118,500 additional officers to over 13,000 of the nation's 18,000 law enforcement agencies across the country in both small and large jurisdictions.

# Grant Monitoring Standards and Guidelines for Hiring and Redeployment

III.    Types of Grants

## III. Types of Grants

Two of the main categories of grants offered under the COPS Program are Hiring and MORE. Of the Hiring grants, six major types were implemented at different stages of the COPS Grants Program. (Other Hiring and Innovative Grants are not specifically addressed in this manual.) Below is a list identifying those COPS grant programs:

- Police Hiring Supplement (PHS)
- Phase I
- Accelerated Hiring, Education, And Deployment (AHEAD)
- Funding Accelerated for Smaller Towns (FAST)
- Universal Hiring Program (UHP)
- COPS in Schools (CIS)
- Making Officer Redeployment Effective (MORE)

The first of these Hiring grant programs, was the Police Hiring Supplement (PHS) grant. This grant was administered by the Bureau of Justice Assistance. PHS was created with the intent to increase police presence in America's communities. Limited funding prohibited the full implementation of PHS and, consequently, only 9% of the overwhelming number of applicants were funded. With the establishment of the COPS Office in October 1994, the remaining qualified PHS applicants (392 agencies) were funded under the Phase I program.

The AHEAD and FAST Programs were the next two programs created by COPS in November 1994. The purpose of the AHEAD Program was to provide funds to larger law enforcement agencies for the purpose of hiring community policing officers. The AHEAD Program provided funds to communities whose populations were 50,000 or more. The FAST Program provided funds to law enforcement agencies for hiring Community Policing officers in communities whose populations had less than 50,000.

In 1995, COPS merged the AHEAD and FAST programs into the Universal Hiring Program (UHP), which provides funds to jurisdictions of any size to hire additional community policing officers. UHP provides funding to eligible entities, regardless of size, who have primary law enforcement authority in their area of jurisdiction.

In 1999, the COPS Office added the COPS in Schools (CIS) Grant Program as an officer hiring program that provides an incentive for law enforcement agencies to build working relationships with schools to use community policing efforts to combat school violence. Funds awarded under the CIS program are to assist law enforcement agencies in hiring additional sworn officers at entry-level officer salaries to serve as School Resource Officers (SROs). Alternatively, CIS funds may be used to pay for entry-level salary and benefits of newly hired, additional sworn officers who will backfill the positions of locally-funded veteran officers deployed as SROs.

The MORE Program, originally created in 1994, provides funding to acquire civilians and/or new technologies. The purpose of these acquisitions is to save sworn officers' time spent on administrative and support tasks, thereby allowing them more time for redeployment into community policing. Each item or position funded under the MORE Program must free up time for a sworn officer (or officers), who is (are) then required to perform community policing activities using that extra time. It should be noted that overtime for sworn officers engaging in community policing activities was also an allowable expense for the MORE '95 grants, but is not allowable under AHEAD, FAST, UHP, CIS or any other MORE grant programs.

# Grant Monitoring Standards and Guidelines for Hiring and Redeployment

IV. Monitoring and Auditing Requirements

# IV. Monitoring and Auditing Requirements

Federal regulations require that the Federal government monitor any financial assistance to ensure that funds are spent properly. All COPS grantees are required to participate in grant monitoring and auditing activities by the COPS Office, the DOJ's Office of the Inspector General (OIG), the DOJ's Office of Justice Programs' Office of the Comptroller (OC), the U.S. General Accounting Office (GAO), and other duly authorized representatives of the Federal government.

The purpose of monitoring is to ensure that grantees meet their programmatic and financial requirements by properly managing funds and following grant program requirements. In general, the COPS Office monitors program activities and financial activities. Monitoring activities include on-site program reviews, the COPS Count survey, Office-Based Grant Reviews, and office-based complaint, financial, and legal reviews.

In addition to direct COPS Office oversight, COPS grants may be subject to an audit by independent or other DOJ examiners. The two primary types of audits are Single Audit Act (SAA) audits and DOJ OIG audits. These audits are designed to determine whether systems are in place and controls established. These reports also provide reasonable assurance that the grantee is managing funds in compliance with laws and regulations.

Failure to comply with monitoring and audit requirements or to remedy any identified grant violations may result in adverse current and future funding determinations, as well as enforcement activities such as suspension or termination of funds, the requirement to repay previously expended grant funds, being barred from receiving further COPS grants, and criminal liability in the event of fraud. The COPS Office and its Federal partners will work closely with COPS grantees to address all identified violations and to provide technical assistance and guidance to help prevent violations from occurring.

## COPS Monitoring

The COPS Office is responsible for monitoring the programmatic and financial aspects of grant awards. Six activities may be used to monitor grant awards by COPS: 1) on-site program reviews, 2) COPS Count survey, 3) Office-Based Grant Reviews, 4) complaint reviews, 5) program progress report reviews, and 6) legal reviews and guidance.

**COPS On-Site Program Reviews.** The objective of the COPS on-site reviews is to evaluate whether selected grantees are meeting their programmatic and financial requirements. Using site visits as one type of monitoring method, the COPS Office is committed to ensuring that COPS grants are properly and effectively implemented pursuant to the authorizing statute, grant assurances and guidelines, and all applicable Federal statutes and regulations.

A site visit provides the COPS Office with the knowledge and documentation of how COPS funds are being used; how compliance issues are being addressed by the grantee; and provides firsthand observation of COPS program implementation and progress.

**COPS Count.** COPS Count is a survey conducted for a sample of MORE grants, to provide an accurate accounting of law enforcement officers redeployed through the purchasing of equipment or hiring of civilians funded by the COPS Office.

During the survey, COPS MORE grant recipients will be contacted by the COPS Office to complete the survey. The grantee will provide updates on the status of grant funded civilian personnel and equipment as well as redeployment dates and related questions for MORE grants and grantee plans concerning future hiring of civilians and redeployment.

**Office-Based Grant Reviews (OBGR).** The Office-Based Grant Review (OBGR) serves as a supplemental activity in support of the overall grant monitoring strategy. It is intended to provide detailed grant monitoring oversight for certain COPS grantees that may not meet the on-site monitoring criteria in a particular fiscal year due to their location and/or amount of funding. The OBGR specifically targets COPS hiring grantees although other types of grants may be reviewed for the same grantee.

Similar to an on-site program review, the OBGR begins with an internal review of grant documentation followed by direct contact with the grantee and the collection of additional and/or supporting documentation to demonstrate whether the grantee is in compliance with its grant requirements. It allows the COPS Office to monitor an overall larger number of grantees than would otherwise be possible only through conducting site visits.

**Complaint Reviews.**  The complaint review system provides a centralized process within the COPS Office to investigate external (media, citizens, etc.) and internal complaints of grantee noncompliance.  A determination is made whether the issues can be resolved through phone or letter contact, or if a site visit is warranted by COPS or the OIG.  The complaint review process includes a review of the grantee's response to the complaint allegations, grantee program progress reports, COPS Count data, COPS Finance/OIG site visit reports, and any other relevant information, including the results of a site visit if deemed necessary.

**Program Progress Report Reviews.**  Grant monitoring is supplemented by reviews of the Hiring and MORE grants Program Progress Reports throughout the life of the grant.

**Legal Reviews and Guidance.**  Additional monitoring is conducted by the Legal Division, including the following areas: contract and cooperative agreement reviews; sole source justification; supplanting and other compliance issues; appeals of compliance determinations; and OIG investigations of COPS grantees involving fraud, abuse, and integrity laws.  Additionally, the Legal Division provides verbal and/or written guidance to grantees on the legal and programmatic requirements of the COPS grant programs to assist in the proper implementation of grant funding.

## Financial Monitoring

The COPS Office also monitors financial issues related to grant awards.  There are two primary activities that are used to monitor the financial aspects of grant awards: 1) on-site financial reviews and 2) office-based financial reviews.

**On-Site Financial Reviews.**  On-site financial reviews are conducted at the grantee's location to assess overall financial management of a grant with a focus on providing the grantee with immediate technical assistance to correct any weaknesses identified.  The on-site financial review includes a review of: (1) the grantee's accounting system and internal controls over the administration of COPS grants; (2) the grantee's cash management procedures; (3) the timeliness and accuracy of Financial Status Reports submitted; and (4) the expenditures charged to the grant to determine if expenditures are allowable and supported.

**Office-Based Financial Reviews.** Grantees are required to submit financial status reports quarterly to COPS Office detailing grant obligations and expenditures. Based in part on the quarterly Financial Status Reports, the office-based financial review includes an analysis of grant activity to date, financial reporting and reconciliation with payments under the grant and local match payments.

## Auditing

**Office of the Inspector General (OIG) Audits.** The OIG was established by law to provide oversight for DOJ Programs, financial and administrative functions. OIG audits are designed to promote economy, efficiency, and effectiveness in the administration of grants by evaluating compliance with laws, regulations, and policies and procedures governing the operations encompassed in the scope of the audit.

All COPS grants, cooperative agreements, and contracts are subject to possible audit by the OIG. Typically, OIG audits encompass all Hiring and MORE grants awarded to the agency, both active and expired. The OIG conducts testing to determine compliance with program, administrative, and financial requirements for each of the grants selected. Compliance areas may include, but are not limited to, supplanting, retention, allowable costs, local match, redeployment, financial and programmatic reporting, and community policing grant provisions. Once the audit is completed, OIG issues a report to the COPS Office and to the grantee, which includes an analysis of areas deemed to be in noncompliance and recommendations for corrective action.

Upon issuance of an audit report, the COPS Office serves as a liaison between the OIG and the audited grantee to review the grantee's response to the audit findings provide technical assistance to the grantee, and resolve and remedy areas of confirmed noncompliance.

**Independent Audits.** The Single Audit Act (SAA) was created in 1984, and established uniform auditing guidelines for State and local governments receiving Federal financial assistance. The 1984 Act was amended in July 1996 to reflect revised audit criteria and reporting requirements. The Office of Management and Budget Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations", provides additional guidelines regarding the implementation of SAA requirements.

Each non-Federal entity that expends a total amount of Federal awards equal to, or in excess of, $500,000 in a fiscal year, is required to have an SAA audit for that fiscal year.

An SAA audit is an examination of a non-Federal entity's financial statements and Federal awards by public accountants or Federal, State or local government audit organizations. The purpose of the SAA audit is to determine: 1) whether financial statements are presented fairly, in conformity with generally accepted accounting principles; 2) whether the schedule of expenditures of Federal awards is presented fairly in relation to the financial statements taken as a whole; 3) if internal controls are sufficient to minimize risk; and 4) compliance with laws, regulations, and grant provisions having a material effect on major programs.

**COPS Audit Division.** The COPS Audit Division is the division within the COPS Office responsible for facilitating closure of audit reports issued by the Office of the Inspector General (OIG) and the General Accounting Office (GAO). The Audit Division serves as the liaison between the OIG and/or GAD and affected grantees or program staff during the conduct of all audits. The Division also responds to all draft audit reports and obtains relevant information from the grantee. Other responsibilities include: facilitating closure of open audit recommendations by corresponding with the grantee; gathering relevant documentation to determine whether the grantee has complied with the terms and conditions of the grant; and ensuring that the grantee remedies any violations in a manner deemed appropriate by the COPS Office, the OIG and/or the GAO.

## Suspension or Termination of Grant Funding

The COPS Office may suspend or terminate funding of a grant in whole or in part if the COPS Office determines that a grant recipient is not:

- substantially complying with the requirements of the Violent Crime Control and Law Enforcement Act of 1994 or with other applicable provisions of Federal law;
- making satisfactory progress toward the goals or strategies in the application and information as reflected by performance and status reports;
- adhering to grant agreement requirements or conditions, whether stated in a Federal statute, regulation, assurance, application, or notice of award;

- submitting reports in a timely manner;
- filing accurate information in an application, periodic report, or other document; or
- submitting for prior approval to the COPS Office any significant changes that the grantee anticipates being made to the application before implementing those changes.